

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF TENNESSEE**  
**KNOXVILLE DIVISION**

ISABEL ZELAYA, et al.,

Plaintiff,

v.

ROBERT HAMMER, et al.,

Defendant.

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No. 3:19-cv-00062-PLR-HBG

**DEFENDANT JOHN WITSELL’S MOTION TO STAY DISCOVERY**

Defendant John Witsell (“Special Agent Witsell”), through counsel and pursuant to Federal Rule of Civil Procedure 26(c), moves this Court for entry of an order staying discovery pending a decision on Special Agent Witsell’s Motion to Dismiss, which asserts (among other defenses) qualified immunity. [See Docs. 334 & 335]. As grounds, Special Agent Witsell adopts and incorporates herein by reference the points and authorities raised in the Motion to Stay Discovery filed by the DHS Defendants and the United States of America [Doc. 354].

Respectfully submitted,

/s/ Mary Ann Stackhouse

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**CERTIFICATE OF SERVICE**

I hereby certify that on this the 15 January 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access the filing through the Court's electronic filing system.

/s/ Mary Ann Stackhouse  
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